

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

W.S. WILSON LEUNG (CABN 190939)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6758
FAX: (415) 436-6753
wilson.leung@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NO. 96-CR-00094-JSW
)	
v.)	
)	APPLICATION AND PROPOSED ORDER
JOHN THAT LUONG,)	
)	
Defendant-Petitioner.)	
)	
)	

Pursuant to the Court's January 27, 2014 Order (Docket #2136), the Government respectfully submits this Application and Proposed Order to request a 60-day extension of the February 27, 2014 filing date of the Government's response to the above-captioned 28 U.S.C. § 2255 motion. The underlying matter was a massive racketeering case that was charged roughly 18 years ago, and defendant-petitioner has presented a variety of claims in his 28 U.S.C. § 2255 motion, with the most recent iteration of the motion being a 46-page counseled brief filed in November 2013. Accordingly, the Government needs additional time to locate and review the relevant records and to prepare its response.

Accordingly, the Government respectfully requests that the date for the filing of the Government's be extended to Monday, April 28, 2014. Pursuant to the Court's January 27, 2014 Order,

1 any reply by defendant-petitioner would be due 30 days thereafter.

2
3 DATED: February 25, 2014

MELINDA HAAG
United States Attorney

4
5 By: /s/
6 W.S. WILSON LEUNG
Assistant United States Attorney

7 Petitioner has not filed an opposition to the Government's motion. Accordingly,

8 FOR THE FOREGOING REASONS, IT IS HEREBY ORDERED THAT the February 27, 2014
9 filing date for the Government's response to the above-captioned 28 U.S.C. § 2255 motion be extended
10 for 60 days until April 28, 2014. Any reply by defendant-petitioner shall be due 30 days after the filing
11 of the Government's response.

12
13 DATED: ~~February~~ March 4, 2014


14 HON. JEFFREY S. WHITE
15 United States District Judge
16
17
18
19
20
21
22
23
24
25
26
27
28